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# Focus

## Hanford's Hazardous Waste Permit



The complex process of producing plutonium for nuclear weapons, begun at Hanford in 1943, has left a legacy of radiological and chemical contamination which will require decades to bring to a safe condition.

In 1989, the state of Washington and the U.S. Environmental Protection Agency (EPA) entered into an agreement with the U.S. Department of Energy called *The Hanford Federal Facility Agreement and Consent Order*, or Tri-Party Agreement, which governs how the Hanford Site will be managed and cleaned up. It requires the Department of Energy to obtain a Resource Conservation and Recovery Act (RCRA) Hazardous Waste Treatment, Storage and Disposal Permit, referred to as the Hanford Facility Wide Permit.

The Tri-Party Agreement and its amendments outline a schedule for the whole Hanford cleanup. The RCRA Facility Wide Permit provides detailed instructions to the Department of Energy (Energy) regarding management of hazardous waste and cleanup actions not completely defined within the Tri-Party Agreement.

The first draft of a facility wide permit was circulated for public review early in 1992. Comments from citizens, site contractors, and Energy led to several major modifications. A second draft facility wide permit was submitted for public review in early 1994. Comments received from the public and the permittees were used to modify the permit once again. The resulting document was issued in final form to the Department of Energy and its contractors on August 29, 1994.

### What the permit contains

Currently, more than 60 treatment, storage or disposal (TSD) units operate at the Hanford Site on an interim permit basis. These units include tank systems, surface impoundments, container storage areas, waste piles, landfills, and miscellaneous units. Present plans call for operating permits for 24 of these units and closure of 34 units. Six waste management units will be handled through other regulatory options.

The facility wide permit contains two permits: requirements for operation of the facility and standards for management under the base RCRA program, and the corrective action conditions for the cleanup of hazardous waste under the Hazardous and Solid Waste Amendments (HSWA) to RCRA.

The Washington State Department of Ecology (Ecology) has issued the operating portion of the permit. The U.S. Environmental Protection Agency has issued the corrective action portion, because Ecology has not yet been delegated authority by the EPA to implement HSWA in Washington State. When full authorization is received, and it is expected sometime in 1994, Ecology will then assume responsibility, with a couple of limited exceptions, for both sections. EPA will continue to administer the Waste Minimization and Land Disposal Restrictions sections.

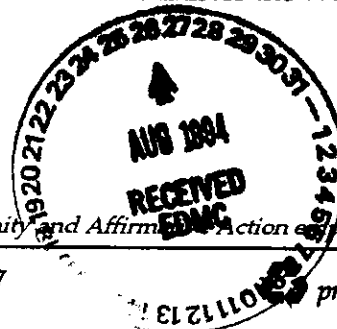
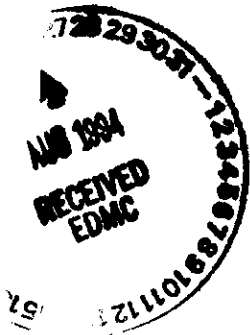
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The permit plan calls for chapters to be added periodically for specific treatment, storage and disposal (TSD) units. As each unit closure plan, or permit application documentation is approved, those units will be added to the facility wide permit through the permit modification process. The public will be invited to participate each time these additions are proposed.

Once all units are included, the facility wide permit will be complete. This strategy will help ensure the regulatory agencies, Ecology and EPA, maintain consistent overall requirements throughout the Hanford Site, while retaining the flexibility to address unit-specific concerns.

## Draft Permit Changes

Based on public hearings and comments in 1994, significant changes in the second draft include:

- Bechtel Hanford, Inc., has been added as a permittee. Bechtel manages the Environmental Restoration Program at Hanford.
- A "permit applicability matrix" has been added as an attachment to provide clarification and help implement the permit across the entire facility.
- A streamlined administrative process has been included in which facility operating records will not require tremendous volumes of duplicative paperwork.

## Unit Facility Permits and Closure Plans

Chapters to authorize operation, or closure, at five Hanford units are part of this version of the permit:

**A. 183-H Solar Evaporation Basins.** The plan allows final closure of four solar evaporation basins in the 100-H Area. The basins, which last received dangerous waste shipments in 1985, stored and treated radioactive mixed wastes generated at the 300 Area fuel-fabrication facilities. The basins are to be demolished, and their contaminated soils are to be removed from the site, or buried and capped in place.

**B. 616 Nonradioactive Dangerous Waste Storage Facility.** Located in the 600 Area between the 200 East and 200 West areas, the facility stores nonradioactive dangerous wastes, which are shipped to off-site commercial treatment and disposal facilities. The permit defines the unit's operating parameters.

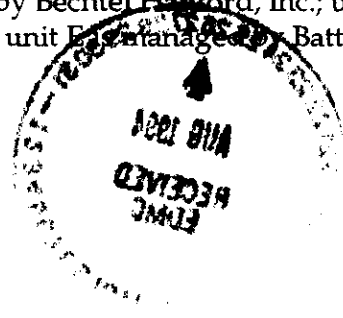
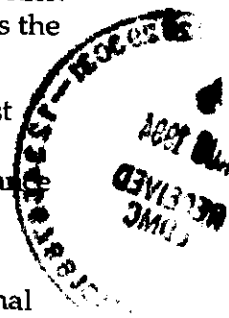
**C. 2727-S Nonradioactive Dangerous Waste Storage Facility.** Located in the southeast portion of the 200 West Area, the facility had stored nonradioactive dangerous wastes generated in research and development laboratories, process operations, and maintenance and transportation functions on the Hanford Site. It was demolished in 1992 and will undergo final closure.

**D. 300 Area Solvent Evaporator.** This facility is an inactive unit which will undergo final closure. It operated as an evaporation treatment unit for dangerous wastes and was demolished in 1986.

**E. 305-B Mixed Waste Storage Facility.** The facility is a storage unit for dangerous and radioactive mixed wastes generated by research and development operations in the 300 Area. Wastes are brought to the facility for storage, repackaging, and/or consolidation. The permit sets forth the facility's operating parameters.

Unit A is managed by Bechtel Hanford, Inc.; units B, C and D are managed by the Westinghouse Hanford Company; unit E is managed by Battelle-Pacific Northwest Laboratories.

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## How can you be involved?

Copies of the final permit, attachments, application, index to the administrative record, comments and responsiveness summary, response to comments, and maps showing exact locations of activities, are available for review at these Hanford Public Information Repositories:

<b>Spokane</b>	Gonzaga University Foley Center E. 502 Boone	(509) 328-4220 ext. 3125
<b>Seattle</b>	University of Washington Suzzallo Library Government Publications Room	(206) 543-4664
<b>Richland</b>	Washington State University, Tri-Cities Public Reading Room, Room 130 100 Sprout Road	(509) 376-8583
<b>Portland</b>	Portland State University Branford Price Millar Library Science and Engineering Floor SW Harrison and Park	(503) 725-3690

All information in the repositories, plus the administrative record, including all data submitted by the applicants, may be reviewed by appointment at the following administrative record locations:

<b>Seattle</b>	U.S. Environmental Protection Agency Hazardous Waste Division 1200 Sixth Avenue	Diane Richardson, (206) 553-1847 Mon.-Fri., 8 a.m.-noon, 1-4 p.m.
<b>Lacey</b>	Washington State Department of Ecology 300 Desmond Drive	Marilyn Smith, (206) 407-7097 Mon.-Fri., 8:30 a.m.-4:30 p.m.
<b>Richland</b>	Westinghouse Hanford Company 2440 Stevens Center Place, Suite 1101	Debbi Isom, (509) 376-2530 Mon.-Fri., 9 a.m.-noon, 1 p.m.-3:30 p.m. (no appointment necessary)

For more information, contact Dan Duncan, U.S. Environmental Protection Agency (206) 553-6693; Joe Witczak, Department of Ecology, (206) 407-7132; or Hanford Cleanup toll-free 1-800-321-2008.

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Washington State Department of Ecology  
Nuclear Waste Program  
P.O. Box 47600  
Olympia WA 98504-7600